



WELCOME TO THE STAKEHOLDER MEETING FOR THE INDUSTRIAL STORMWATER NPDES GENERAL PERMIT

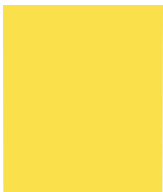
Please note that everyone is entering the meeting with their microphones muted.

Please keep your microphones muted except when you are speaking.
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To make a comment during this meeting, please do one of the following:

- Indicate you would like to make a comment using the Chat feature.
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GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

NPDES Industrial Stormwater General Permit (IGP) Stakeholder Draft

Veronica Crow
EPD Watershed Protection Branch
Nonpoint Source Program

Stakeholder Meeting
October 26, 2021



NPDES INDUSTRIAL STORMWATER GENERAL PERMIT

- ❖ Authorization to Discharge Under the National Pollutant Discharge Elimination System (NPDES) Storm Water Discharges Associated with Industrial Activity
- ❖ Permit No. GAR050000
- ❖ Current Permit – Expires on **May 31, 2022**
- ❖ The Stakeholder Draft Permit is available on GAEPDs website:
<https://epd.georgia.gov/forms-permits/watershed-protection-branch-forms-permits/storm-water-forms/npdes-industrial-storm>



STAKEHOLDER INVOLVEMENT

STAKEHOLDER DRAFT PERMIT & PUBLIC MEETINGS

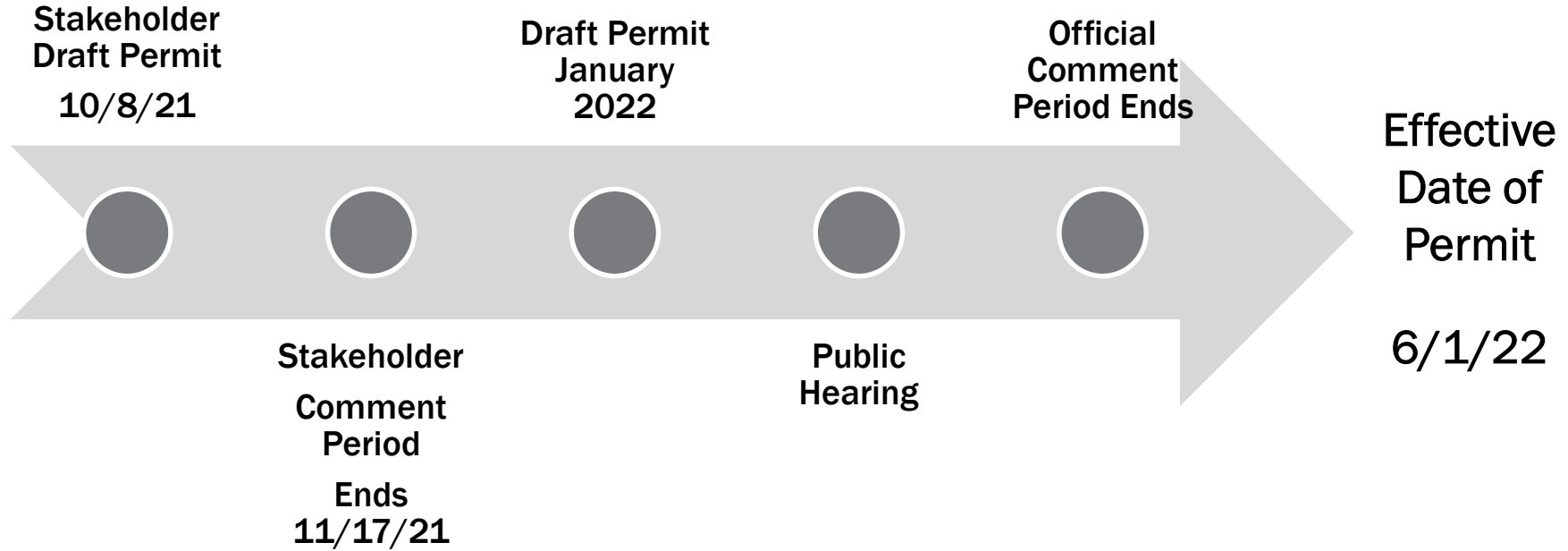
- ❖ Stakeholder draft & meeting notice – October 8, 2021

- ❖ Stakeholder Meetings
 - ❖ October 26, 2021 – Sectors A, C, E, F, J, K M, N, O, Q, R, S, U, AA
 - ❖ November 8, 2021 – Sectors B, D, G, H, I, LF, P, T, V, W, X, Y, Z
 - ❖ November 9, 2021 – Open to all Sectors

- ❖ Comment Period - Closes on November 17, 2021
 - ❖ Written comments on the stakeholder draft permit should be sent to industrial.sw@dnr.ga.gov by COB 11/17/2021. Please include “IGP Stakeholder Draft” in the subject line of the email.



PERMIT RENEWAL PROCESS





GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

NPDES Industrial Stormwater General Permit (IGP) Stakeholder Draft

Sophia Grant-Branklyn
EPD Watershed Protection Branch
Nonpoint Source Program
Stormwater Unit

Stakeholder Meeting
October 26, 2021



IGP STAKEHOLDER DRAFT PROPOSED CHANGES TO THE PERMIT

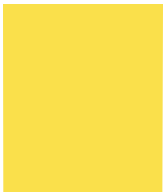
- ❖ Boilerplate Modifications
- ❖ Part 1 – Permit Coverage
- ❖ Part 2 – Control Measures and Effluent Limits
- ❖ Part 4 – Inspections
- ❖ Part 5 – Stormwater Pollution Prevention Plan (SWPPP)
- ❖ Part 6 – Monitoring
- ❖ Part 7 – Reporting and Record Keeping
- ❖ Part 8 – Sector Specific Requirements for Industrial Activity
- ❖ Appendix A - Definitions
- ❖ Appendix C – Impaired Stream Segment Sampling and Requirements
- ❖ Appendix E – Benchmarks for Hardness Dependent Metals and Discharges to Saltwater



BOILERPLATE CHANGES

Boilerplate updates throughout the permit include the following:

- ❖ Electronic reporting language & updates to be consistent with electronic reporting system
- ❖ Previous permit references
- ❖ Annual Report Due dates
- ❖ Renumber to accommodate new sections and updated references
- ❖ Web links updated
- ❖ Minor language cleanup for consistency (i.e., permittee)





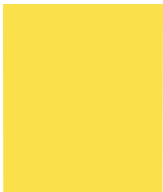
ELECTRONIC REPORTING PERMIT CHANGES

- ❖ Updated language to reflect electronic reporting in consistency with the National NPDES Electronic Reporting Rule (40 CFR Part 127) and provided additional clarification regarding submittals
- ❖ Electronic Reporting Systems
 - ❖ GEOS – Georgia EPD Online System
 - ❖ NetDMR – Network Discharge Monitoring Report



ELECTRONIC REPORTING PERMIT CHANGES

- ❖ Electronic Reporting applies to the following:
 - ❖ Notices of Intent (NOI) - GEOS
 - ❖ No Exposure Exclusion (NEE) - GEOS
 - ❖ Notice of Termination (NOT) - GEOS
 - ❖ Annual Reports - GEOS
 - ❖ Indicator Monitoring - NetDMR
 - ❖ Benchmark Monitoring – NetDMR
 - ❖ Effluent Limitation Monitoring – NetDMR
 - ❖ Impaired Waters Reporting – NetDMR





PART 1 – PERMIT COVERAGE

- ❖ **How to Obtain Authorization – Part 1.3.1**
 - ❖ Revised language to require submittal of electronic NOI.
 - ❖ Table 1-1 was revised to reflect that discharge authorization is immediate upon submittal of electronic NOI. Removed language referring to authorization on the day the NOI is postmarked. Added a footnote to table clarifying that discharges are not authorized if the NOI is incomplete, inaccurate or if the permittee is ineligible for coverage.
- ❖ **Change in Owner/Operator – Part 1.3.6**
 - ❖ Added language clarifying current process regarding completing and submitting a facility information form when there is a transfer of ownership.



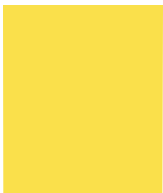
PART 1 – PERMIT COVERAGE

- ❖ **Requirement to Post a Sign of Permit Coverage – Part 1.3.7**
 - ❖ Added language requiring the posting of a sign or notice of permit coverage in a publicly accessible location.
 - ❖ Added language detailing content of sign.
- ❖ **Information to be Included on NOT – Part 1.4.3**
 - ❖ Added language requiring submittal of all outstanding annual reports and/or required monitoring data.
- ❖ **Conditional Exclusion for No Exposure – Part 1.5**
 - ❖ Added additional guidance on what materials or activities must not be exposed to precipitation in order to qualify for NEE.



PART 2 – CONTROL MEASURES & EFFLUENT LIMITS

- ❖ Control Measure Selection and Design Considerations - Part 2.1.1
 - ❖ Added language requiring additional consideration of enhanced control measures for facilities that could be impacted by major storm events such as hurricanes, storm surge, extreme/heavy precipitation, and flood events.





PART 4 - INSPECTIONS

- ❖ Updated language to clarify that permittee must initiate corrective actions in accordance with Part 3 if routine, quarterly visual or annual comprehensive inspections show evidence of stormwater pollution
- ❖ Quarterly Visual Assessments – Part 4.2.2
 - ❖ Clarified rainfall documentation - rainfall amounts, duration and event dates & times
 - ❖ Clarified stormwater discharge observations - descriptions to include relative quality, quantity, or degree of each characteristic listed in Part 4.2.1
- ❖ Substantially identical outfalls – Part 4.2.3.3
 - ❖ Added language that the permittee must ensure that a visual assessment is performed on each outfall at least once during the permit term.



PART 5 – STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

❖ Site Description – Part 5.1.3

- ❖ Site maps must include size & material type details for the following: structural controls, conveyances, inlets and outfalls

❖ Non-Stormwater Discharges – Part 5.1.4.4

- ❖ Clarified testing alternatives to smoke and dye test

❖ Additional Documentation – Part 5.4

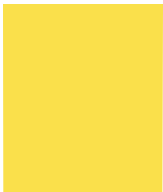
- ❖ On-line data management systems may be used provided they are readily available, viewable, and easily navigated



PART 5 – STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

New Requirement

- ❖ **Making the SWPPP Publicly Available – Part 5.3.2**
 - ❖ Should not contain information exempt from public disclosure under the Georgia Open Records Act or other applicable law
 - ❖ SWPPP must be publicly available (two options)
 1. NOI Attachment (GEOS)
 2. Permittee hosted URL containing the SWPPP
 - ❖ SWPPP must be available upon permit issuance or 45 after routine annual inspections (for updated SWPPPs)





PART 6 – MONITORING

- ❖ **Substantially Identical Outfalls – Part 6.1.1**
 - ❖ New requirement to monitor substantially identical outfalls on a rotating basis to ensure each outfall is monitored at least once during permit term (visual assessments & benchmark monitoring)

- ❖ **Monitoring Periods – Part 6.1.7**
 - ❖ Updated dates and added language to require monthly reporting using NetDMR even if no sampling occurred

- ❖ **New Indicator Monitoring Requirements – Part 6.2.1**
 - ❖ Report only monitoring; no benchmark; failure to monitor is a permit violation
 - ❖ Includes exemption for inactive and unstaffed sites



PART 6 – MONITORING

❖ New Indicator Monitoring (Annual)

- ❖ pH, Total Suspended Solids (TSS), and Chemical Oxygen Demand (COD) – all Sectors (requirement met if parameter is a monitored benchmark or effluent limit)
- ❖ Polycyclic aromatic hydrocarbons (PAHs)
 - ❖ All facilities/sectors that will be sealed or re-sealed with coal-tar sealcoat
 - ❖ Specific Sectors– Sectors A (facilities that manufacture, use, or store creosote or creosote-treated wood in areas exposed to precipitation), C (SIC 2911), D, F, I, M, O, P (SIC 4011, 4013, 5171), Q (SIC 4491), R, and S



PART 6 – MONITORING

❖ Benchmark Monitoring Schedule – Part 6.2.2.2

- ❖ Added language requiring benchmark monitoring be conducted within one of the first two quarters of the calendar year or in the first full quarter of permit coverage, whichever comes first, or as soon as possible during the next qualifying rain event if none occurs during the specified time.
- ❖ Added language detailing additional measures to be followed for continued benchmark exceedances including the implementation of additional pollution prevention/ good housekeeping control measures, up to installation of structural controls.
- ❖ Added clarification regarding eligibility to resume annual benchmark monitoring once benchmark is met.



PART 6 – MONITORING

❖ Effluent Limit Monitoring – Part 6.2.3.1

- ❖ Added language requiring effluent limitations monitoring be conducted within one of the first two quarters of the calendar year or as soon as possible during the next qualifying rain event should none occur within the first 180 calendar days.
- ❖ Replaced “one year” with “180 days” to ensure that facilities previously conducting effluent limitation sampling under the 2017 IGP are continuing to monitor for effluent limitations annually.
- ❖ Table 6-1 was revised to delete effluent monitoring for mine dewatering discharges, which is a prohibited non-stormwater discharge per Part 8.J.2.1 and discharges are covered under the General NPDES Permit for Mining and Processing Facilities (GAG300000).



PART 7 – REPORTING & RECORDKEEPING

New requirement – Discharge Monitoring Reports (DMRs)

- ❖ All NOIs, NEEs, NOTs, Annual Reports, DMRs must be submitted electronically.
- ❖ Reporting Monitoring Data to EPD – Part 7.1
 - ❖ Monitoring data must be submitted through NetDMR.
- ❖ Submission Deadline for Indicator, Benchmark and Impaired Waters Monitoring and Sampling Data – Part 7.2
 - ❖ DMRs are due on the 15th day of the month following the reporting period
 - ❖ Monthly reporting of monitoring data required
- ❖ Submittals – Part 7.7
 - ❖ Only alternative benchmark documentation may be submitted via hardcopy

For more information about DMRs visit:

<https://epd.georgia.gov/forms-permits/eservices/netdmr-technical-assistance>



PART 8 - NEW INDICATOR MONITORING REQUIREMENTS

Annual monitoring for pH, TSS and COD

Subsectors (Permittees may be subject to requirements for more than one sector/subsector)	Indicator Monitor Parameter	Indicator Monitoring Threshold
All Subsectors not already subject to benchmark or effluent monitoring for these parameters	pH	Report Only/No thresholds or baseline values
	Chemical Oxygen Demand (COD)	Report Only/No thresholds or baseline values
	Total Suspended Solids (TSS)	Report Only/No thresholds or baseline values



PART 8 - NEW INDICATOR MONITORING – ALL SECTORS

PAH Monitoring for all facilities using coal-tar sealcoat

Subsector (Permittees may be subject to requirements for more than one sector/subsector)	Indicator Monitor Parameter	Indicator Monitoring Threshold
Applies to facilities in all Sectors with stormwater discharges from paved surfaces that will be initially sealed or re-sealed with coal-tar sealcoat where industrial activities are located during coverage under this permit	Polycyclic Aromatic Hydrocarbons (PAHs)*	Report Only/No thresholds or baseline values
* Monitoring is required for the 16 individual PAHs identified at Appendix A to 40 CFR Part 423: naphthalene, acenaphthylene, acenaphthene, fluorene, phenanthrene, anthracene, fluoranthene, pyrene, benzo[a]anthracene, chrysene, benzo[b]fluoranthene, benzo[k]fluoranthene, benzo[a]pyrene, benzo[<u>g,h,i</u>]perylene, <u>indeno</u> [1,2,3-c,d]pyrene, and <u>dibenz</u> [a,h]anthracene.		



PART 8 - NEW INDICATOR MONITORING

- ❖ Polycyclic aromatic hydrocarbons (PAHs) – Specific Sectors
 - ❖ Sector A (facilities that manufacture, use, or store creosote or creosote-treated wood in areas exposed to precipitation)
 - ❖ Sectors C (SIC 2911), D (SIC 4011, 4013, 5171), Q (4491)
 - ❖ Sectors D, F, I, M, O, P, R and S

Subsector (Permittees may be subject to requirements for more than one sector/subsector)	Indicator Monitor Parameter	Indicator Monitoring Threshold
Specific Sectors only	Polycyclic Aromatic Hydrocarbons (PAHs)*	Report Only/No thresholds or baseline values



APPENDIX A - DEFINITIONS

The following definitions have been added or revised:

- ❖ Impaired Stream Segments

Revised: Updated web link

- ❖ Network Discharge Monitoring Report (NetDMR)

- ❖ New Discharger

Revised: Updated reference to current permit



APPENDIX C – IMPAIRED WATERS

- ❖ Impaired Stream Segment Sampling and Requirements
 - ❖ Revised language to enhance clarity and readability.

- ❖ Specific Sampling Requirements for Discharges into an Impaired Stream Segment – C.2
 - ❖ Revised language to require that sampling results be submitted through NetDMR.

- ❖ Applicable Impaired Waters Benchmark Values – C.2.1
 - ❖ Added list of impairments to be addressed in later sections:
Dissolved Oxygen, Bio F and Bio M or Sediment, Bacteria,
Toxicity, Chlorophyll



APPENDIX C – IMPAIRED WATERS

- ❖ Specific Requirements for Discharges into a Stream Segment Impaired by Bio F and Bio M or Sediment – C.2.3
 - ❖ Revised title for consistency with water quality standards.

- ❖ Specific Requirements for Discharges into a Stream Segment Impaired or Listed as Assessment Pending for Bacteria – C.2.4
 - ❖ Revised the section for consistency with proposed water quality standards.
 - ❖ Added clarification regarding current bacteria indicator.
 - ❖ Added language to reflect monitoring requirements for *E. coli* and enterococci benchmark values that will be applicable once new bacteria criteria is approved.



APPENDIX C – IMPAIRED WATERS

- ❖ Specific Requirements for Discharges into a Stream Impaired by Non-Pollutant Specific Toxicity Criteria Including but Not Limited to Effluent Toxicity, Fish Tissue Contamination, or Shell-fishing Ban – C.2.5

- ❖ Revised with the updated pollutants for consistency with water quality standards.

- ❖ Specific Requirements for Discharges into Water Bodies Impaired by Chlorophyll *a* – C.2.6

- ❖ Added language that requires biannual Total Phosphorous and Nitrogen (Nitrate + Nitrite) indicator monitoring for discharges into waters impaired for Chlorophyll *a*.

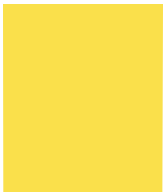


APPENDIX E – BENCHMARKS FOR HARDNESS DEPENDENT METALS

Revised for consistency with the most recent GA Rules for Water Quality Control

Revised Benchmarks

- ❖ Cadmium = 0.033 mg/L (saltwater)
- ❖ Cyanide = 0.0052 mg/L (freshwater)
- ❖ Table E-3 Hardness Ranges for Cadmium, Copper, Lead, Nickel and Zinc (freshwater)

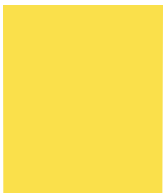




QUESTIONS?

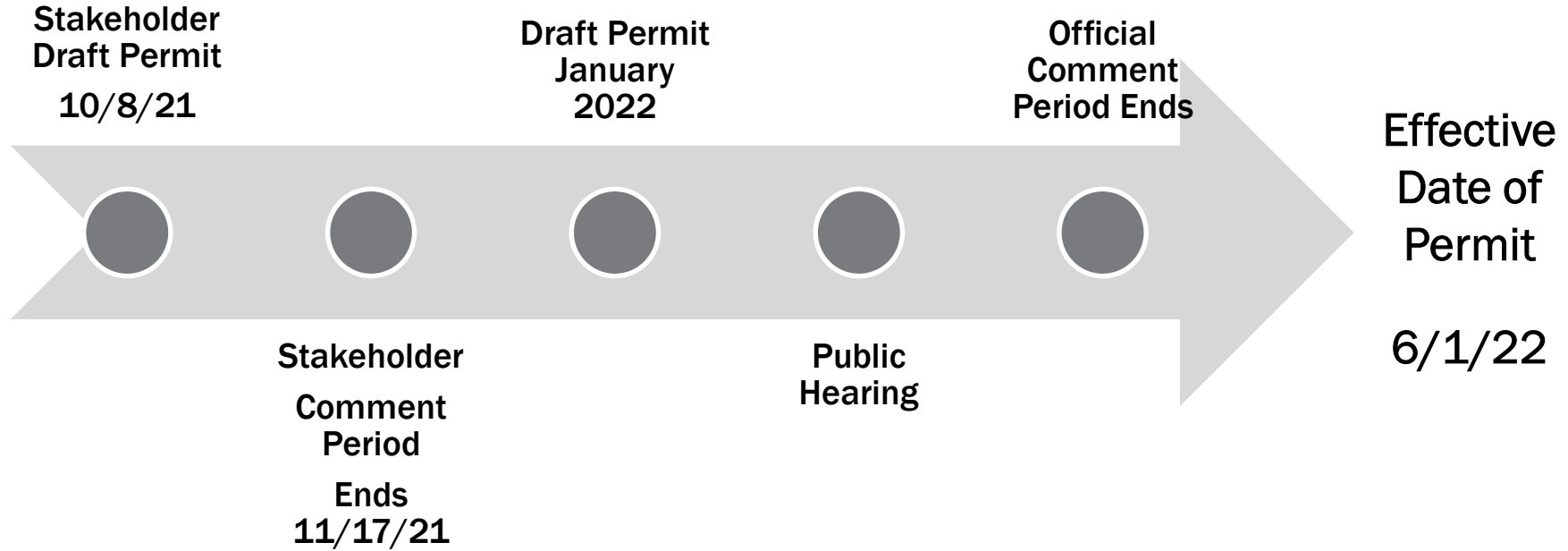
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PERMIT RENEWAL PROCESS





REMINDERS

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- ❖ To sign up for email alerts:
https://public.govdelivery.com/accounts/GADNR/subscriber/new?topic_id=GADNR_614

